

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>  <b>HON. ROBERT B. KUGLER</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	

**NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

**TO: Megan Grossman, Esq.**  
**Lewis Brisbois Bisgaard & Smith LLP**  
**550 E. Swedesford Road, Suite 270**  
**Wayne, Pennsylvania 19087**

*Counsel for Defendant Camber Pharmaceuticals, Inc.*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Ronald Cerminaro, Director, Commercial Strategy and Operations, on May 19, 2021, at 9:00 a.m. eastern standard time, and continuing until completion, at Lewis Brisbois Bisgaard & Smith LLP, 550 E. Swedesford Road, Suite 270, Wayne, Pennsylvania 19087, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached hereto, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

**TAKING ATTORNEYS FOR PLAINTIFFS:**

CHARLES E. WHORTON, ESQ.  
Rivero Mestre LLP  
2525 Ponce de Leon Blvd., Suite 1000  
Miami, Florida 33134  
Telephone: (305) 445-2500  
Fax: (305) 445-2505  
[cwhorton@riveromestre.com](mailto:cwhorton@riveromestre.com)

The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

March 2, 2021

By: /s/Andrés Rivero  
ANDRÉS RIVERO  
Rivero Mestre LLP  
2525 Ponce de León Blvd.  
Suite 1000  
Miami, Florida 33134  
Telephone: (305) 445-2500  
Fax: (305) 445-2505  
[arivero@riveromestre.com](mailto:arivero@riveromestre.com)

*Counsel for MSP Recovery Claims,  
Series LLC*

## **EXHIBIT A**

### **30(B)(6) TOPICS**

#### *Communications with Finished Dose Customers and Downstream Customers*

1. 39. HLL and/or Camber's product recall for HLL's valsartan finished dose sold or distributed in the United States, including who Camber communicated with, how, about what, and the retention of recalled or sequestered HLL valsartan finished dose.
2. 40. All credits, indemnification, refunds, and/or penalties paid or provided by or to HLL and/or Camber in connection with the nitrosamine contamination of HLL's valsartan API and finished dose sold or distributed in the United States.

#### *Product Tracing*

3. 46. Tracing of batches and lots of HLL's valsartan finished dose Camber sold or distributed downstream and ultimately intended for use by consumers in the United States.
4. 48. The pricing of HLL's valsartan finished dose that was ultimately sold or distributed in the United States by Camber.
5. 50. The gross and net profits to HLL and/or Camber from the sale or distribution of HLL's valsartan finished dose in the United States.
6. 51. The quantity/units of HLL's valsartan finished dose sold or distributed by Camber in the United States.
7. 53. HLL and Camber's valsartan finished dose sales and pricing data produced by HLL and/or Camber in this litigation (sample documents to be provided at least 30 days ahead of deposition during meet and confer process).

## **EXHIBIT B**

### **DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Ronald Cerminaro.
2. The complete production of Ronald Cerminaro's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>  <b>HON. ROBERT B. KUGLER</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	

**CERTIFICATE OF SERVICE**

I hereby certify that on March 2, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/Andrés Rivero  
ANDRÉS RIVERO  
Rivero Mestre LLP  
2525 Ponce de Leon Blvd., Suite 1000  
Miami, Florida 33134  
Telephone: (305) 445-2500  
Fax: (305) 445-2505  
[arivero@riveromestre.com](mailto:arivero@riveromestre.com)

*Counsel for MSP Recovery Claims,  
Series LLC*